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Attorney for Plaintiff and Putative Class  
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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

MIRYAM ABITBOL, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

v.

CURRENT ENERGY LLC

AND

KEVIN ADAMS

*Defendants.*

Case No.

2:24-cv-08132-FLA-BFM

**JOINT REQUEST FOR  
TELEPHONIC APPEARANCE  
ON JANUARY 31 OR TO  
CONTINUE HEARING**

**Hearing**

**Date: January 31, 2025**

**Time: 1:30 PM**

**Courtroom: 6B**

**Hon. Fernando L. Aenlle-Rocha**

**Complaint Served: Sept 26, 2024**

**Trial Date: None Set**

Counsel for Plaintiff, Miryam Abitbol (“Plaintiff”), and Defendants Current  
Energy LLC and Kevin Adams (“Defendants”) hereby request to be permitted to  
appear telephonically at the January 31, 2025 hearing on the Defendants’ Motion

1 to Dismiss in this matter, or in the alternative, to reschedule the hearing. Counsel  
2 make this request based on the following:

3 1. Plaintiff's counsel is located in Glenside, Pennsylvania. It will cost  
4 considerable time and expense for Plaintiff's counsel to attend the Court's Hearing  
5 in-person. As such, a personal appearance will cause an undue hardship. Plaintiff's  
6 counsel is also defending a deposition that was previously scheduled for the early  
7 portion of the same day, and will be able to meet both obligations only if the  
8 hearing is conducted virtually.  
9

10 2. Defendants' lead counsel is located in Holland, Michigan. The cost the  
11 defendants will incur for counsel to appear for the hearing in-person will be  
12 considerable. As such, a personal appearance will cause an undue hardship.  
13

14 3. Moreover, both counsel for Plaintiff and for Defendants have made emailed  
15 requests to Twyla Freeman, per the Court's direction on its website, in an effort to  
16 attend the hearing virtually, but received no response.  
17

18 4. In the alternative, counsel for Plaintiff and Defendants respectfully request  
19 that the Court continue the hearing to Friday, February 21, to permit the  
20 undersigned counsel to make travel arrangements and resolve scheduling conflicts.  
21

22 5. As this is a joint request, neither Counsel is opposed to this relief. Given this  
23 additional consideration, and practicalities that it would impose if one party  
24 attended in person and another party attended virtually, and given the further  
25

1 scheduling difficulties that the Parties are unable to account for owing to the  
2 shortened remaining time frame here, it furthers the interests of justice and the  
3 spirit of FED. R. CIV P. 1 to permit attendance via telephone/Zoom for all Counsel  
4 or alternatively reschedule the hearing in person for February 21.  
5

6 Respectfully submitted,  
7

8  
9 Dated: January 28, 2025  
10

11 Respectfully submitted,  
12 /s/ Andrew Roman Perrong  
13 Andrew Roman Perrong, Esq.  
14 PA Bar #333687 (*Pro Hac Vice*)  
15 Perrong Law LLC  
16 2657 Mount Carmel Avenue  
17 Glenside, Pennsylvania 19038  
18 Phone: 215-225-5529 (CALL-LAW)  
19 Facsimile: 888-329-0305  
20 a@perronglaw.com

21 /s/ John D. Fitzpatrick  
22 John D. Fitzpatrick  
23 MI Bar #P85884 (admitted *pro hac vice*)  
24 Cunningham Dalman PC  
25 321 Settlers Road  
26 Holland, MI 49422-1767  
27 (616) 392-1821  
28 jfitzpatrick@cunninghamdalman.com  
*Attorneys for Defendants*

1                                   **ATTESTATION OF SIGNATURE**

2           Pursuant to Central District Local Rule 5-4.3.4(a)(2)(i), I hereby certify that  
3 the content of this document is acceptable to counsel for Defendants, and I obtained  
4 their authorization to affix his electronic signature to this document.

5  
6 Dated: January 28, 2025

7                                   /s/ Andrew Roman Perrong  
8                                   Andrew Roman Perrong, Esq.

9  
10                                  **CERTIFICATE OF SERVICE**

11           I hereby certify that, on January 28, 2025, I caused the foregoing to be  
12 electronically filed with the Clerk using the CM/ECF system, which will send  
13 notification of such filing to all counsel of record.  
14

15  
16                                  /s/ Andrew R. Perrong  
17                                  Andrew R. Perrong